JOSEPH S. HAZELL,

v.

CIVIL ACTION

Plaintiff,

NO. 02-CV-2866

BP PRODUCTS NORTH AMERICA, INC.,:

FILED JUL - 2 2002

Defendant.

MOTION FOR ADMISSION PRO HAC VICE OF MARY L. CASEY

I, Janice G. Dubler, counsel for Defendant BP Products North America Inc. (hereinafter "BP") in the above action, and being a member in good standing of the bar of this Court, hereby move the Court to admit pro hac vice Mary L. Casey, Esquire, of the Illinois bar, and in support of said motion state that:

1. Mary L. Casey is an in-house attorney for BP with an address and telephone number as follows:

> BP America, Inc. Law Department MC 2101A 200 East Randolph Drive Chicago, IL 60601-7125 (312) 856-6656

2. Ms. Casey is admitted to practice before the following courts:

<u>Court</u>	Date of Admission
Supreme Court of the United States	1998
United States District Court for the Northern District of Illinois	1981
Supreme Court of Illinois	1981

See Declaration of Mary L. Casey, attached hereto as Exhibit "A".

- 3. Ms. Casey regularly counsels BP management and staff on a wide range of employment issues, and is familiar with the law and facts pertinent to this case. BP believes that its defense would be furthered if Ms. Casey is permitted to participate fully and on the record in that defense.
- If admitted pro hac vice in this matter, Ms. Casey will abide by the Local Rules of 4. Civil Procedure of the Eastern District of Pennsylvania. Pursuant to Local Rule 83.5.2(a), the undersigned will remain counsel of record.

WHEREFORE, counsel for Defendant BP hereby requests that this Court grant its

Motion for Admission Pro Hac Vice of Mary L. Casey, Esquire, in the above-captioned matter.

Respectfully submitted,

Edward T. Ellis

Attorney I.D. No. 23680

Janice G. Dubler

Attorney I.D. No. 76578

Montgomery, McCracken, Walker & Rhoads, LLP

123 South Broad Street

Philadelphia, PA 19109-1099

Attorneys for Defendant BP Products North America Inc.

Dated: July 1, 2002

CERTIFICATE OF SERVICE

I, Janice G. Dubler, do hereby certify that on the 1st day of July, 2002, I served a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Mary L. Casey, Esquire, via U.S. First Class Mail, postage prepaid, upon the following individuals at the address indicated:

Nancy C. DeMis, Esquire
Dena B. Calo, Esquire
Gallagher, Schoenfeld, Surkin & Chupein, P.C.
25 West Second Street
Media, PA 19063-0900

Janice G. Dubler, Esquire

JOSEPH S. HAZELL,

v.

CIVIL ACTION

Plaintiff,

NO. 02-CV-2866

BP PRODUCTS NORTH AMERICA, INC.,:

Defendant.

DECLARATION OF MARY L. CASEY IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

- I, Mary L. Casey, declare that the following information is true and correct:
- 1. I make this declaration in support of an application that I be permitted to appear in the above-captioned civil action. This certification is based upon my personal knowledge.
- 2. I am an attorney at law in the State of Illinois, and am employed by defendant BP Products North America, Inc. as in-house counsel.
- 3. I am a member of the bar of the State of Illinois; I am admitted to practice law in the United States District Court for the Northern District of Illinois; and I am admitted to the bar of the United States Supreme Court.

- 4. I am and at all times have been a member in good standing in every jurisdiction in which I have been admitted to practice.
 - 5. There are no disciplinary proceedings against me in any jurisdiction.
- 6. I am associated in this matter with Edward T. Ellis and Janice G. Dubler who are attorneys-at-law of the Commonwealth of Pennsylvania and admitted to practice before this Court.
- 7. My employer, BP America, Inc., has requested that I personally assume responsibility for its defense in this case.
- 8. There is a good cause for my admission pro hac vice in this matter because of my relationship as in-house counsel with BP America, Inc.:
- In this capacity, I regularly counsel BP America, Inc. and BP Products (a) North America, Inc. management and staff regarding a range of employment issues.
- (b) I not only supervise, but also personally handle, litigation nationwide for BP America, Inc. as an integral part of my job responsibilities.
- Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing 9. is true and correct.

Mary L. Casey

v.

CIVIL ACTION

Plaintiff,

NO. 02-CV-2866

BP PRODUCTS NORTH AMERICA, INC.,:

Defendant.

CERTIFICATE OF COUNSEL OF UNCONTESTED MOTION **PURSUANT TO LOCAL RULE 7.1(b)**

The undersigned counsel for Defendant BP Products North America Inc. hereby certifies, pursuant to Local Rule of Civil Procedure 7.1(b), that the attached Motion For Admission of Mary L. Casey, Esquire Pro Hac Vice, is uncontested.

Attorney I.D. No. 76578

Montgomery, McCracken, Walker & Rhoads, LLP

nice Dury

Attorneys for Defendant

BP Products North America Inc.

JOSEPH S. HAZELL,	: : CIVIL ACTION	
Plaintiff,	: •	
v.	: NO. 02-CV-2866	
BP PRODUCTS NORTH AMERICA, INC.,		
Defendant.		
ORDER GRANTING ADMISSION PRO HAC VICE AND NOW, this day of, 2002, upon the motion of counsel		
for Defendant BP Products North America Inc	c. and finding no opposition, it is ORDERED that	
Mary L. Casey, Esquire, is hereby admitted pr	ro hac vice.	
	BY THE COURT:	
	J	